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December 31, 2019

**By Electronic Mail**

Paul Farrell  
Greene Ketchum Farrell Bailey and Tweel LLP  
419 Eleventh Street  
Huntington, WV 25701

**Re: In Re National Prescription Opiate Litigation, No. 17-md-2804**

*Cabell County Commission v. AmerisourceBergen Drug Corporation, et al.*, Case No. 1:17-op-45053  
(S.D. W. Va.)

Dear Counsel,

I write on behalf of AmerisourceBergen Drug Corporation, Cardinal Health, Inc., and McKesson Corporation to identify custodial sources of relevant documents (including ESI) that are within Cabell County's possession, custody, or control. This request is made pursuant to CMO No. 3, paragraph 4, and it addresses custodial sources only. It is not intended to diminish the County's obligation to marshal and produce documents from custodial and non-custodial sources known to the County.

We request production from the custodial files of the individuals listed by name or position on Exhibit A. We have included individuals you identified in discovery responses, as well as additional custodial sources whom we identify either by name or by description. Please confirm that you will produce custodial files for each of the identified custodial sources, as well as identify by name the custodians whom we have described by position. We reserve the right to identify additional custodial sources as discovery and investigation continue.

Thank you for attention to this request. We look forward to conferring further with you on this topic.

Very truly yours,

/s/ Steven J. Boranian

Steven J. Boranian

SJB:dr

**Exhibit D**

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Exhibit A

- **Angela Saunders** – Director of Cabell County Substance Abuse Prevention Partnership
- **Stephanie Conley** – Community Outreach Coordinator, Cabell County Substance Abuse Prevention Partnership
- **Jeannie Harrison** – Coordinator, Cabell County Substance Abuse Prevention Partnership
- **Michael Kilkenny** – Physician Director at Cabell-Huntington Health Department
- **Timothy Hazelett** – Administrator, Cabell-Huntington Health Department
- **Elizabeth Adkins** – Health and Wellness Director, Public Information Officer and Public Health Educator, Cabell-Huntington Health Department
- **Kathleen Napier, R.N.** – Nursing Director, Cabell-Huntington Health Department (2018-present)
- **Michelle Perdue** – Harm Reduction Coordinator, Cabell-Huntington Health Department
- **Jack Mease** – Accountant, Cabell-Huntington Health Department
- **Casey Napier** – Accreditation Coordinator, Cabell-Huntington Health Department
- **Kim Lockwood** – Epidemiology, Cabell-Huntington Health Department
- **Allen Woodrum** – Director of Information Technology, Cabell-Huntington Health Department
- **Elizabeth Ayers** – Past PH Educator/PIO, Cabell-Huntington Health Department
- **Jenny Erwin** – Past SNS Back-up, Cabell-Huntington Health Department
- **Nancy Hall** – Past Administrative Services, Cabell-Huntington Health Department
- **Stanley Mills** – Past Program Manager, Cabell-Huntington Health Department
- **Harry Tweel, MD** – Past Physician/Director, Cabell-Huntington Health Department
- **Jesse Boner** – Past IT, Cabell-Huntington Health Department
- **Laura Johnson** – Secretary, Cabell-Huntington Health Department
- **Karen Hall-Dundas** – Environmental, Sanitarian Supervisor, Cabell-Huntington Health Department
- **Rodney Melton** – Chief Sanitarian, Cabell-Huntington Health Department
- **Fred Kitchen** – Board of Directors, Cabell-Huntington Health Department
- **Dan Konrad** – Board of Directors, Cabell-Huntington Health Department
- **Danny Porter** – Board of Directors, Cabell-Huntington Health Department
- **Donna Rumbaugh** – Board of Directors, Cabell-Huntington Health Department
- **Robert Sweeney** – Board of Directors, Cabell-Huntington Health Department
- **Kevin Yingling** – R.Ph., MD - Board of Directors, Cabell-Huntington Health Department
- **Tom Gilpin** – Past Chair of Board of Directors, Cabell-Huntington Health Department
- **Harriet Cyrus** – Past Board of Directors, Cabell-Huntington Health Department
- **Gregory L. Howard, Jr.** – Past Board of Directors, Cabell-Huntington Health Department
- **Sally Oxley, PT** – Past Board of Directors, Cabell-Huntington Health Department

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- **Omayma T. Touma, MD** – Past Board of Directors, Cabell-Huntington Health Department
- **Lance Whaley** – Regional Director of Field Operations for Region 2
- **Janice McCoy** – Community Service Manager for Cabell County
- **Beverly Koerber** – Regional Manager of Cabell County Child Support Enforcement
- **Tina Mitchell** – Deputy Commissioner, Field Operations, for Regions II and IV
- **Linda Watts** – Commissioner of BCF
- **Nancy Exline** – Former Commissioner of BCF
- **Jim Weekly** – Bureau Chief Financial Officer for BCF
- **Greg Shavers** – Director of Grants and Contracts for BCF
- **Janie Cole** – Deputy Commissioner, Programs and Resource Development for BCF
- **Monica Hamilton** – Director, Family Assistance for BCF
- **Laura Bamo** – Director, Child and Adult Services for BCF
- **Sue Hage** – Former Deputy Commissioner for Office of Programs, BCF
- **Jean Sheppard** – Deputy Commissioner for Office of Operations of BCF
- **Melanie Urquhart** – Director, Office of Social Services for BCF
- **Bea Bailey** – Executive Secretary for BCF
- **Kristina Wandzel** – Administrative Secretary for Field Operations and Programs and Resource Development, BCF
- **Chuck Zirkle, Jr.** – Cabell County Sheriff (2017-present)
- **Doug Adams** – Chief Deputy at Cabell County Sheriff's Office (2017-present)
- **Lt. Dan Ennix** – Detective at Cabell County Sheriff's Office (2016-present)
- **Tom McComas** – Former Sheriff at Cabell County Sheriff's Office (2009-2016)
- **Kim Wolfe** – Former Sheriff at Cabell County Sheriff's Office (2001-2008)
- **Doug Ferguson** – Former Chief Deputy at Cabell County Sheriff's Office (2009-2016)
- **James Sheidler** – Former Chief Deputy at Cabell County Sheriff's Office (2006-2008)
- **Dan Marcum** – Information Technology Specialist at Cabell County Sheriff's Office
- **Samantha Childers** – Chief Tax Deputy at Cabell County Sheriff's Office (Tax Division)
- **Betty Bates** – Former Chief Tax Deputy at Cabell County Sheriff's Office (Tax Division)
- **Irv Johnson** – Cabell County Assessor (2016-present)
- **Ottie Adkins** – Cabell County Assessor (2006-2015)
- **Kathy Moore** – City of Huntington Finance Director (2017-present)
- **Rick Montgomery** – City of Huntington Assistant Finance Director
- **Phyllis Smith** – Clerk at Cabell County Clerk (2016-present)
- **Sean Hammers** – Prosecutor at Cabell County Prosecutor's Office (2014-present)
- **Chris Chiles** – Former Prosecutor at Cabell County Prosecutor's Office (2006-2013)
- **Charles W. Peoples Jr.** – Assistant Prosecutor at Cabell County Prosecutor's Office
- **Kellie M. Neal** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Jara L. Howard** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Lauren E. Plymale** - Assistant Prosecutor at Cabell County Prosecutor's Office

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- **Kent L. Bryson** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Margaret Phipps Brown** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Sharon M. Frazier** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Joe Fincham** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Ryan Hamady** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Sherron Hornbuckle** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Jason Spears** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Sarah Dixon** - Assistant Prosecutor at Cabell County Prosecutor's Office
- **Tim Murphy** – Investigator at Cabell County Prosecutor's Office
- **Dawn Drown** – Victim Advocate at Cabell County Prosecutor's Office
- **Jeremy Bailey** - Victim Advocate at Cabell County Prosecutor's Office
- **Steve Kern** - Victim Advocate at Cabell County Prosecutor's Office
- **Tim Murphy** – Investigator at Cabell County Prosecutor's Office
- **Madeline Pearson** – Information Technology Specialist at Cabell County Prosecutor's Office
- **Jeff Hood** – Clerk at Cabell County Circuit Court (2016-present)
- **Adele Chandler** – Former Clerk at Cabell County Circuit Court (2006-2015)
- **Faye Allen** – Office Manager at Cabell County Circuit Court (2006-2015)
- **Janet McCoy** – Office Manager at Cabell County Circuit Court (2016-present)
- **Josh Parlier** – Cabell County Drug Court Coordinator
- **Charles McCann** – Cabell County Drug Court, Women's Empowerment and Addiction Recovery Track, Chief Probation Officer
- **Jennifer Wells-Browning** – Cabell County Drug Court, Women's Empowerment and Addiction Recovery Track, Deputy Chief Probation Officer
- **Faren Block** – Cabell County Drug Court, Women's Empowerment and Addiction Recovery Track, Probation Officer
- **Chautle Hought** – West Virginia Probation Office, Drug Court Specialist
- **Lauren Dodrill** – Cabell County Drug Court, Probation Officer
- **Matt Meadows** – Cabell County Drug Court, Probation Officer
- **Connie Priddy** – Compliance Officer/QRT Coordinator at CCEMS (2017-present); Corporate Compliance at CCEMS (2011-present)
- **Gordon Merry** – Director, CCEMS (2011-present)
- **Stephen Murray** – Assistant Director, CCEMS (2006-present)
- **David Wright** – Medical Director CCEMS (2006-present)
- **Brenda Webb** – IT at CCEMS (2011-present)
- **Larresca Cox** – Paramedic at CCEMS (2013-present)
- **Suzanne Frye** – Accounts Payable at CCEMS (2018-present)
- **Rose Woodrum** – Medical Billing Manager at CCEMS (2017-present)
- **Anne Margit Blankenship** – Administrative Secretary at CCEMS (2006-present)
- **Steve Vititoe** – Logistics/Paramedic at CCEMS (2006-present)
- **Joe Whitt** – IT at CCEMS (2009-2010)
- **Mary Beth Steele** – Accounts Payable at CCEMS (2010-2017)

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- **Tracey McComas** – Medical Billing Manager at CCEMS (2010-2017)
- **Mike Davis** – Director of Cabell County 911 (2006-present)
- **Mike Tatum** – Assistant Director of Cabell County 911 (2006-present)
- **Natalie McComas** – Shift Supervisor of Cabell County 911 (2006-present)
- **Dan Marcum** – IT of Cabell County 911
- **J.R. Van Ottingham** – IT of Cabell County 911
- **Jan Rader** - City of Huntington Fire Chief
- **Ray Canafax** – City of Huntington Fire Deputy Chief
- **Justin Antle** – City of Huntington Fire Deputy Chief
- **Nancy Cartmill** – Cabell County Commissioner, County Commission President
- **Kelli Sobonya** – Cabell County Commissioner
- **Jim Morgan** – Cabell County Commissioner
- **Beth Thompson** – Administrator at County Commission
- **April Saunders** – Assistant Administrator at County Commission (2015-present)
- **Sandy Davis** – Purchasing Agent at County Commission
- **Greg Shoemaker** – IT at County Commission, Sheriff, County Clerk, Circuit Clerk (2017-present)
- **Ann Yon** – Former Cabell County Commissioner
- **Scott Bias** - Former Cabell County Commissioner
- **Bob Bailey** - Former Cabell County Commissioner
- **Chris Tatum** - Former Administrator at Cabell County Commission
- **Steve Zoeller** - Former Administrator at Cabell County Commission
- **Ryan Cole** - Former Assistant Administrator at Cabell County Commission
- **Clayton Bates** – Former IT at Cabell County Commission
- **Joseph Whitt** - Former IT at Cabell County Commission
- **Steve Williams** – City of Huntington Mayor
- **Cathy Burns** – Executive Director, Former/Acting City Manager, City of Huntington
- **Sherry Lewis** – City of Huntington Human Resources Director
- **Scott Lemley** - City of Huntington Planning and Development Director; former member of Mayor's Office of Drug Control Policy
- **Bryan Chambers** - City of Huntington Communications Director
- **Kim Bailey** – City of Huntington Purchasing Director
- **Jim Johnson** - City of Huntington Former Director of Mayor's Office of Drug Control Policy
- **Jim Insko** – City of Huntington Public Works Director
- **Breanna Shell** - City of Huntington Planning Director
- **Kohson Perkins** – City of Huntington IT Director
- **Brandon White** – City of Huntington Former IT Director
- **Ryan Saxe** – Cabell County Board of Education Superintendent

We further request production from sources likely to have custody of documents and ESI relating to:

- Executive leadership

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- Plaintiff's organizational structure
- Law enforcement
- Courts and other judicial bodies (including but not limited to drug courts)
- Prosecution of civil and criminal offenses
- Child and family services
- Regulation of the provision of healthcare
- Regulation of prescription medicines (including but not limited to FDA and other governmental regulators)
- Regulation of controlled substances (including but not limited to DEA and other governmental regulators)
- Budget, finance, and expenditures (including but not limited to former County Clerks)
- Fire, rescue, and emergency services
- Public health
- Addiction or mental health services
- Local hospitals and other healthcare providers
- Pharmacies and the dispensing of prescription drugs
- Social services (including but not limited to services for homelessness)
- Human resources
- Investigation of drug overdose (including but not limited to medical examiners and coroners)
- Correctional facilities and jailers
- Pharmacy benefit managers
- Benefits plans (public and private)
- "Task forces" or comparable bodies related to drug use (including but not limited to those who worked on the City-County Task Force Addressing Heroin and Opioid Abuse)